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WILLIAMS & CONNOLLY LLP

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MEMO ENDORSED

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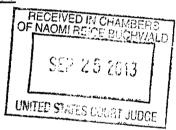
eward Dennett Williams (1920-1955)

Paul R. Connolly (1922-1978)

September 25, 2013

VIA FACSIMILE AND FEDERAL EXPRESS

Hon. Naomi Reice Buchwald United States District Court Judge United States District Court for the Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, NY 10007-1312



Re:

Flynn, et al. v. Irish Bank Resolution Corp., et al., C.A. No. 13-cv-3882 (NRB)

Dear Judge Buchwald:

I write on behalf of KPMG LLP ("KPMG US") regarding the pre-motion teleconference in the above-referenced matter currently scheduled for September 26, 2013, at 4:00 PM. As noted in my letter of September 4, 2013, we previously requested that the teleconference be postponed until after a hearing scheduled for September 20, 2013 in the Chapter 15 bankruptcy proceeding filed by Defendant Irish Bank Resolution Corporation ("IBRC") in the United States Bankruptcy Court for the District of Delaware, so that the parties could update the Court on developments resulting from that hearing. On September 24, IBRC informed this Court that the Bankruptcy Court has entered a stay of this litigation. See Notice of Commencement of Chapter 15 Proceeding and Stay of Litigation (Dkt. No. 16). In light of this development, the parties jointly request that the Court cancel tomorrow's teleconference. The parties have agreed to notify the Court when the stay is lifted so that steps can be taken at that time to determine how best to proceed. Thank you for your consideration of this matter.

Sincerely

William Ashworth

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cc: Leonard Zack, Esq. Richard Beran, Esq. Paul Hessler, Esq.